

IN THE DRAWINGS

A new Figure 4 is submitted herewith.

REMARKS

The drawings were objected to under 37 C.F.R. § 1.83(a) because they did not show the “memory manager” as recited in claims 12 and 16 and the “pointer table” as recited in claim 21. New Figure 4 submitted herewith has been added to show these features. No new matter has been added. Support for the drawings can be found in the original claims and at page 6, lines 16-23. Withdrawal of the rejection is respectfully requested.

Claims 12-22 have been amended and new claims 23-31 have been added. No new matter has been added. Support for new claims 23-31 can be found in the originally filed claims and throughout the specification.

Claims 17 and 19 stand rejected under 35 U.S.C. § 112 for lack of antecedent basis for the claim limitation “the blocks.” Claims 17 and 19 have been amended to refer to “data blocks. Withdrawal of the rejection is respectfully requested.

Claims 21 and 22 also stand rejected 35 U.S.C. § 112 for lack of antecedent basis. The lack of antecedent basis was caused by an error in the dependency of these claims, and claims 21 and 22 have been amended to correct this error. Withdrawal of the rejection is respectfully requested.

Claims 12-22 stand rejected under 35 U.S.C. § 102 as being anticipated by U.S. Patent No. 6,041,001 (“Estakhri”). This rejection is respectfully traversed. Claim 12 requires the step of “determining a plurality of available memory areas in a digital, re-writable semiconductor memory controlled by a memory manager,” “randomly selecting an available memory area from among the plurality of available memory areas,” and “storing the data block in the selected available memory area.” As discussed in the specification at page 1, line 28 – page 2, line 10, this random selection of an available memory area from among a plurality of available memory

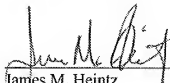
areas has two advantages: 1) it increases security, and 2) it decreases memory wear. Security is increased because multiple memories in a system, such as multiple memories on different smart cards, will not have corresponding contents stored at the same location in the memory. Wear on the memory is decreased because the random selection of available memory areas ensures that a same area of memory is not constantly reused while other areas are infrequently or never used.

In contrast to claim 12, Estakhri neither discloses nor suggests the random selection of available memory areas for storing a data block. Rather, Estakhri's system involves the use of an error correcting code. However, the error correcting code has nothing to do with the area of the memory in which a data block will be stored. Accordingly, Estakhri fails to disclose the random selection of an available memory area and withdrawal of the rejection is respectfully requested.

In light of the above, Applicant submits that this application is now in condition for allowance and therefore request favorable consideration. If any issues remain which the Examiner feels may be best resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact Applicant's counsel, James M. Heintz at 202.861.3900.

Respectfully submitted,

DLA PIPER US LLP

A handwritten signature in black ink, appearing to read 'James M. Heintz', is written over a horizontal line.

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